REMARKS

The Office Action dated June 20, 2005 has been received and carefully considered. In this Response, claims 9, 11, and 24 have been amended. Claim 10 has been cancelled without prejudice. Support for the amendments may be found in the specification and drawings as originally filed. Reconsideration of the outstanding rejections in the present application is respectfully requested based on the following remarks.

Rejection to Claim 13

At page 3 of the Office Action, claim 13 was rejected to as failing to comply with the written description requirements. This rejection is respectfully traversed. One of ordinary skill in the art would understand the term "wherein motion estimation is performed to determine the type of data" as it is clear and unambiguous and would understand that this term is well supported in the specification, including on page 4, lines 16-26 of the Application. Further, the claim language itself is sufficient disclosure. Accordingly, withdrawal of the rejection to claim 13 is respectfully requested.

Anticipation Rejection of Claims 1-2, 4-8, 19 and 21-23

At page 3 of the Office Action, claims 1-2, 4-8, 19 and 21-23 were rejected under 35 U.S.C. Section 102(b) as being anticipated by Jang et al. (U.S. Patent No. 5,481,487). This rejection is respectfully traversed.

With respect to claim 1, the claim presently recites "when in a first mode of operation, accessing table data in a table in a first manner to perform a first transform of the first data; and when in a second mode of operation, accessing table data in the table in a second manner to perform a second transform of the first data, wherein the second transform is an inverse transform relative to the first transform." These elements are not disclosed or suggested by Jang.

The Office Action asserts that these elements are illustrated as block 140 in FIG. 4 of Jang. However, block 140 merely illustrates a one-dimensional "DCT/IDCT circuit." (Jang, col. 9, lines 27-30). According to Jang, "[t]he transpose memory 120 outputs the matrices y^t in shuffled column row order to the DCT circuit 140 (or column row order in the case of an IDCT circuit 140)." (Jang, col. 9, lines 16-18). Thus, block 140 is *either* a DCT circuit (for certain implementations) *or* an IDCT circuit (for other implementations). Further, there is no disclosure

in Jang that block 140 may operate as both a DCT circuit and an IDCT circuit in one application. There is no disclosure or suggestion in Jang that block 140 can operate in different modes of operation to perform different transforms on input data or that Jang accesses table data in different manners. Therefore, Jang fails to disclose or suggest each and every element of claim 1.

Claims 2 and 4-8 depend from claim 1. Accordingly, Jang fails to disclose each and every element of these claims, at least by virtue of their dependency on claim 1. Further, claims 2 and 4-8 recite additional non-obvious features.

With respect to claim 19, the claim recites "a table access component to: access said table in a first manner to perform a first transform, access said table in a second manner to perform a second transform, wherein the second transform is an inverse transform relative to the first transform." As explained above, Jang does not disclose or suggest a table access component that can perform two different transforms in different manners, where one transform is the inverse of the other transform. Accordingly, Jang fails to disclose or suggest each and every element of claim 19.

Claims 21-23 depend from claim 19. Accordingly, Jang fails to disclose each and every element of these claims, at least by virtue of their dependency on claim 19. Further, claims 21-23 recite additional non-obvious features.

In view of the forgoing, it is respectfully submitted that the obviousness rejection of claims 1-2, 4-8, 19 and 21-23 is improper. Withdrawal of this rejection and reconsideration of the claims therefore is respectfully requested.

Anticipation Rejection of Claims 9, 10, 12-16 and 24-27

At page 4 of the Office Action, claims 9, 10, 12-16 and 24-27 were rejected under 35 U.S.C. Section 102(e) as being anticipated by Chen et al. (U.S. Patent No. 6,618,442). Claims 9 and 24 have been amended. Claims 10 and 13 have been cancelled. The rejection is traversed.

Claim 9, as amended, recites "when in a first mode of operation, accessing one of the first table or the second table in a first manner to perform a first transform; and when in a second mode of operation, accessing one of the first table or the second table in a second manner to perform a second transform, wherein the second transform is an inverse transform relative to the first transform." Chen does not disclose these features. Chen discloses, at FIG. 4, a method for applying a transform to a video signal. In one mode of operation, the Chen system performs an

8x8 IDCT transform, and in a second mode the Chen system performs a 2-4x8 operation. However, Chen does not disclose a system or method that performs a first transform in one mode of operation and a second transform in a second mode of operation wherein the second transform is an inverse transform relative to the first transform. Accordingly, Chen fails to disclose each and every element of claim 9.

Claims 12 and 14-16 depend from claim 9. Accordingly, Chen fails to disclose each and every element of these claims, at least by virtue of their dependency on claim 9. Further, claims 12 and 14-16 recite additional elements not disclosed by Chen.

Claim 24, as amended, recites a system to "when in a first mode of operation, access one of the first table or the second table in a first manner to perform a first transform; and when in a second mode of operation, access one of the first table or the second table in a second manner to perform a second transform, wherein the second transform is an inverse transform relative to the first transform." As explained above, Chen does not disclose a system or method that performs a first transform in one mode of operation and a second transform in a second mode of operation wherein the second transform is an inverse transform relative to the first transform.

Claims 25-27 depend from claim 24. Accordingly, Chen fails to disclose each and every element of these claims, at least by virtue of their dependency on claim 24. Further, claims 25-27 recite additional elements not disclosed by Chen.

In view of the forgoing, it is respectfully submitted that the obviousness rejection of claims 9, 10, 12-16 and 24-27 is improper. Withdrawal of this rejection and reconsideration of the claims therefore is respectfully requested.

Obviousness Rejection of Claims 3, 11 and 20

At page 6 of the Office Action, claims 3, 11 and 20 were rejected under 35 U.S.C. Section 103(a) as being unpatentable over Jang and Chen. This rejection is respectfully traversed.

Claim 3 depends from claim 1. As explained above, Jang fails to disclose or suggest each and every element of claim 1, and Chen does not disclose or suggest those elements lacking in Jang. Accordingly, Jang and Chen, in combination and individually, fail to disclose or suggest each and every element of claim 3, at least by virtue of its dependence on claim 1.

Claim 20 depends from claim 19. As explained above, Jang fails to disclose or suggest each and every element of claim 19, and Chen does not disclose or suggest those elements

lacking in Jang. Accordingly, Jang and Chen, in combination and individually, fail to disclose or suggest each and every element of claim 20 at least by virtue of its dependence on claim 19.

Claim 11 depends from claim 9. As explained above, Chen fails to disclose or suggest each and every element of claim 1, and Jang does not disclose or suggest those elements lacking in Jang. Accordingly, Jang and Chen, in combination and individually, fail to disclose or suggest each and every element of claim 11, at least by virtue of its dependence on claim 9.

In view of the forgoing, it is respectfully submitted that the obviousness rejection of claims 3, 11 and 20 is improper. Withdrawal of this rejection and reconsideration of the claims therefore is respectfully requested.

Conclusion

The Applicants respectfully submit that the present application is in condition for allowance, and an early indication of the same is courteously solicited. The Examiner is respectfully requested to contact the undersigned by telephone at the below listed telephone number in order to expedite resolution of any issues and to expedite passage of the present application to issue, if any comments, questions, or suggestions arise in connection with the present application.

The Commissioner is hereby authorized to charge any fees, which may be required, or credit any overpayment, to Deposit Account Number 50-0441.

Respectfully submitted,

___10/14/05___
Date

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